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## BEFORE THE ARIZONA CORPORATION COMMISSION

WILLIAM A. MUNDELL  
Chairman

JIM IRVIN  
Commissioner

MARC SPITZER  
Commissioner

2002 DEC -3 A 9:09

AZ CORP COMMISSION  
DOCUMENT CONTROL

IN THE MATTER OF THE APPLICATION  
OF THE ARIZONA ELECTRIC DIVISION  
OF CITIZENS COMMUNICATIONS  
COMPANY TO CHANGE THE CURRENT  
ADJUSTMENT CLAUSE RATE TO  
ESTABLISH A NEW PURCHASE POWER  
AND FUEL ADJUSTMENT CLAUSE  
BANK, AND TO REQUEST APPROVED  
GUIDELINES FOR THE RECOVERY OF  
COSTS INCURRED IN THE CONNECTION  
WITH ENERGY RISK MANAGEMENT  
INITIATIVES

DOCKET NO. E-01032C-00-0751

**STAFF'S RESPONSE TO THE  
ARIZONA ELECTRIC DIVISION OF  
CITIZENS COMMUNICATIONS  
MOTION TO SUSPEND**

Arizona Corporation Commission

DOCKETED

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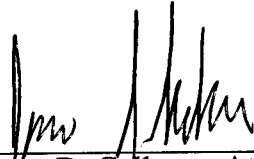
Staff of the Utilities Division ("Staff") of the Arizona Corporation Commission ("Commission") hereby respectfully files its response to the motion to suspend filed by the Arizona Electric Division of Citizens Communications ("Citizens") in this matter. Staff supports suspension of this case, given the latest developments outlined in Citizens' pleading. Staff has conferred with representatives for both Citizens and UniSource Energy Corporation ("UniSource") and agrees that suspending this proceeding in light of the upcoming asset purchase approval application is appropriate at this time. Staff further recommends that the current procedural schedule set in the procedural order of September 27, 2002 be suspended.

Staff also requests that a procedural conference should be set up on the same date as procedural conferences regarding the asset purchase application, and the recently-filed Citizen's Gas Rate Case Application (Docket No. G-01032A-02-0598)<sup>1</sup>. While Staff is not recommending

<sup>1</sup>In Staff's most recent pleading on Docket No. G-01032A-02-0598, Staff recommended January 15, 2003 for a procedural conference. Staff would recommend that date in this docket.

1 consolidation of the three cases, Staff understands that the three cases are strongly-related and that  
2 the procedure in this case should be influenced by the procedural paths of the other proceedings.

3 RESPECTFULLY SUBMITTED this 3<sup>rd</sup> day of December, 2002.

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13  
14 The original and fifteen (15)  
15 copies of the foregoing filed  
16 this 3<sup>rd</sup> day of December, 2002, with:

17 Docket Control  
18 Arizona Corporation Commission  
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20 Phoenix, Arizona 85007

21 COPIES of the foregoing mailed this  
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